

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street - 10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton  
Executive Director  
and Attorney-in-Chief*

*Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge*

May 23, 2022

**BY ECF**

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Mario Martinez Beltran,  
21 Cr. 473 (CM)**

Dear Judge McMahon:

I write to request that the Court modify Mr. Martinez Beltran's bail conditions to replace his home-detention condition with a condition of a curfew to be set by Pretrial Services. The requested modification is appropriate given Mr. Martinez-Beltran's nearly 11 months of full compliance with Pretrial Supervision, including several months of full-time employment, six days per week. It will allow him greater flexibility to care for and entertain his minor children in the warm weather.

Neither the government nor Pretrial Services has any objection to this request.

Respectfully submitted,  
/s/  
Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

cc: AUSA Danielle Kudla  
USPSO Jonathan Lettieri (by email)

*Application granted.  
S. O. D. E. C.*

*Mr. G. K. O. S.*

*U.S.D.S.*

*5/24/22 Part 1*